

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

Amanda Turner Nobles,)	
Plaintiff,)	
)	Civil Action No. 2:05-cv-886
v.)	
)	
)	
Protocol Recovery Services, Inc. and)	
MRS Associates, Inc.,)	
Defendants.)	

**MOTION FOR LEAVE TO AMEND COMPLAINT
AND ADD DEFENDANT**

COMES NOW Plaintiff, Amanda Turner Nobles, by and through her counsel of record, respectfully moving this Honorable Court for leave to amend her complaint as to Defendant Protocol and to add a party defendant, MRS Associates, Inc. For cause Plaintiff states as follows:

1. Since the filing of this suit certain information has come to the attention of counsel for Plaintiff that necessitates the modification of facts related to Defendant Protocol. This information also relates to a new defendant not heretofore a named party.
2. The Court entered a Scheduling Order in this case on December 21, 2005. Pursuant to the Scheduling Order the cut-off date for Plaintiff to amend pleadings and add parties is June 16, 2006.
3. In the interests of judicial economy Plaintiff seeks to add MRS Associates, Inc. as a named defendant.
4. The joinder of this defendant will not deprive this Court of jurisdiction over the subject matter of this action.
5. In the absence of MRS Associates, Inc. Plaintiff will not be afforded complete

relief.

6. It is anticipated that Defendant Protocol will not be prejudiced in any way by the addition of MRS Associates, Inc. as a party.

The above considered Plaintiff respectfully moves for leave to amend her complaint as to Defendant Protocol and to add MRS Associates, Inc. Said Amended Complaint attached hereto.

Respectfully submitted this the __24th__ day of January, 2006.

s/K. ANDERSON NELMS
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing on the following parties and/or counsel by placing a copy of the same in the United States mail, postage prepaid and properly addressed, or by electronic delivery on this _24th_ day of January, 2006.

Neal DeWitt Moore , III, Esq.

Anna Williams, Esq.

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